



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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April 21, 2016

Mr. Tom Mahler
On Scene Coordinator, Superfund Division
United States Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Comments on West Lake Landfill Operable Unit-1 Draft Incident Management Plan

Dear Mr. Mahler:

The Missouri Department of Natural Resources has reviewed the above referenced document prepared by Engineering Management Support, Inc. dated March 21, 2016. The Department's Hazardous Waste Program, Federal Facilities Section has coordinated with the Solid Waste Management Program, and compiled comments attached to this letter. As requested by EPA, this document has been reviewed for conformance with required elements specified by the Unilateral Administrative Order for Removal Action, dated December 9, 2015.

Thank you for giving us the opportunity to review and comment on this document. If you have any questions pertaining to these comments please contact me by phone at (573) 751-8628, or by written correspondence at P.O. Box 176, Jefferson City, MO 65102

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in black ink, appearing to read "Ryan Seabaugh".

Ryan Seabaugh, P.E.
Federal Facilities Section

RS:rl

Cc: Bradley Vann, EPA Region 7

Enclosure: Incident Management Plan Comments



MISSOURI DEPARTMENT OF NATURAL RESOURCES
Comments on the West Lake Landfill Operable Unit-1
Incident Management Plan (IMP)
April 21, 2016

GENERAL COMMENTS:

1.) Relating to Item 3 of the Unilateral Administrative Order (UAO)

The item requires Defined responses at OU1 for various emergency scenarios.

Comment: Where applicable, response diagrams should include an alert to the health physicist

2.) Relating to Item 3 of the UAO

The item requires Defined responses at OU1 for various emergency scenarios.

Comment: Defined responses should also include significant earth movement and slope failures, in addition to natural disasters such as tornados and flooding.

3.) Relating to Item 7 of the UAO

The item discusses acquisition and deployment of offsite equipment.

Comment: It is unclear from the IMP what offsite items, if any, are needed and what time frames are for deployment. Please include discussion of any necessary offsite items.

4.) Relating to Item 7 of the UAO

The item requires a description of how equipment will be maintained for the duration of the IMP.

Comment: A maintenance plan was not found. Please include a maintenance plan.

5.) Relating to Item 9 of the UAO

The item requires a description of monitoring and sampling gear to be used by landfill personnel.

Comment: The list of available resources (Table 2) does not contain resources for runoff monitoring, sediment sampling, or air monitoring. Please include additional resources related to monitoring and sampling.

6.) Relating to Item 10 of the UAO

The item requires measures to prevent offsite runoff of potentially contaminated fire suppression water.

Comment: The described measures on page 18 for runoff prevention appears limited in scope, and temporary in nature. Improvements should be made to the plan to ensure long-term prevention and testing of runoff water during emergency events.

7.) Relating to Item 11 of the UAO

The item requires air monitoring and sampling for protection and characterization of the impacts of the incident.

Comment: No mention of air monitoring was found. Please include discussion of air monitoring during emergency events. Additional consideration should be made for events where the current stations are damaged or electrical service is lost.

8.) Relating to Item 11 of the UAO

The item requires discussion of capture, characterization and proper management of fire suppression water.

Comment: No mention of characterizing fire suppression water was found. Please include discussion on characterizing fire suppression water.

9.) Relating to Item 11 of the UAO

The item requires characterization of potentially impacted soils.

Comment: Characterization of soils defers to a temporary, task-specific HASP. Please incorporate all relevant HASPs into this document so that it may be a stand-alone document.

10.) Relating to Item 12 of the UAO

The item requires description of soil stabilization measures of a surface fire.

Comment: No mention of soil stabilization measures of a surface fire was found. Please include discussion of soil stabilization measures.

SPECIFIC COMMENTS:

11.) Page 1, Third paragraph

The document states: "Waste materials containing radionuclides have been identified in the two solid waste disposal areas designated as Areas 1 and 2"

Comment: Waste materials containing radionuclides have also been identified in the buffer zone/crossroad property, and the property is included in OU-1. Please include the buffer zone/crossroad property in the description of OU-1. Please make this correction throughout the document.

12.) Page 3, Second paragraph

The document states: "Based on the presence of radionuclides in West Lake Landfill OU-1 Areas 1 and 2, these two areas have been designated as restricted and as such are completely fenced, and access to these areas is controlled."

Comment: Waste materials containing radionuclides have also been identified in the buffer zone/crossroad property, and the property is included in OU-1. Please include the buffer zone/crossroad property in the description of OU-1.

13.) Page 5, Second paragraph

The document states: "The Bridgeton Landfill (see Figure 2 for location) covers about 52 acres of the 214-acre property and is a primary focus of this IMP. In addition, a concrete mixing plant, a waste transfer station, two legacy disposal areas, discussed below, and many appurtenant features are present on the site property."

Comment: The concrete mixing plant was removed to make room for the leachate pretreatment plant. The reference to the concrete mixing plant should be removed.

14.) Page 10, Third paragraph

The document states: "In addition, all personnel who enter OU-1 are required to participate in General Employee Radiation Training (GERT) every two years"

Comment:

- It is my understanding that GERT training is required every year. Please verify how often GERT training is required.
- The statement and the following paragraph suggest that the personnel who are required to have GERT training are those who regularly enter OU-1. Does this requirement also apply to all first responders and onsite response personnel? If so, will advanced notification of training be provided, and training offered to area response personnel?

15.) Page 13, Surface Fire Response chart

The response steps for a Level 1 event is cut off.

Comment: Please review and modify response charts to ensure all steps are completely visible.

16.) Page 13, Surface Fire Response chart

The response steps for a Level 0 event excludes assessment of potential damage to systems and making repairs.

Comment: This item has been removed from the original approved Bridgeton plan, and is applicable to both Bridgeton Landfill and West Lake Landfill. Please re-insert the language in the appropriate location.

17.) Page 16, Incident Figure

Comment: The title states that the emergency response chart is for sudden waste movement; however the procedures appear to be for leachate release. Please review and correct as needed.

18.) Page 17, Second paragraph

The document states:

“2. If entry is required into Area 1 or 2 to respond to an incident make every attempt to confine vehicles and personnel to the roads and portions of Areas 1 and 2 that are covered by rock material; and
3. If entry into portions of Areas 1 and 2 that are not covered by rock is necessary, utilize Tyvek suits, boot covers and plastic gloves (available at the OU-1 Area 1 and Area 2 command trailers shown on Figure 3) to the extent possible.”

Comment: Are the command posts and radiation PPE accessible to responders 24 hours/day, 7 days/week?

19.) Page 17, Third paragraph

The document states: “In the event that entry into Areas 1 and 2 is necessary, all personnel and equipment should be subject to radiation screening upon exiting Area 1 or 2.”

Comment: “should” should be changed to “shall”

20.) Page 17, Fourth paragraph

The document states: "In addition, because of the presence of radionuclides in OU-1 Areas 1 and 2, the West Lake Landfill OU-1 health physicist and the OU-1 project coordinator should be contacted (Table 1)"

Comment: "should" should be changed to "shall"

21.) Page 18, Second paragraph

The document states: "In the event that response to an incident in OU-1 prior to completion of installation of the noncombustible cover directed by EPA's Administrative Order involves application of water that could run off of Area 1 or Area 2 (e.g., use of water to suppress a vegetation fire), temporary berms will be constructed within the downstream stormwater channels as necessary to create temporary retention structures to prevent water from running off the site into the stormwater conveyance system along the perimeter of Areas 1 and 2."

Comment:

- The Incident Management Plan is not a temporary document to be discarded after the TCRA action, the phrase "prior to completion of installation of the noncombustible cover directed by EPA's Administrative Order" should be removed
- How long does it take to install a temporary berm, and how will that affect emergency response?

22.) Page 18, Second paragraph, last sentence

The document states: "This additional response measure will not be required following installation of the noncombustible cover since that cover will eliminate the risk that radionuclides could be carried off-site by the water."

Comment: Incidents and emergency response actions may damage the non-combustible cover, and therefore, emergency response should require runoff water monitoring consistent with storm water ARARs. This sentence should be deleted.

23.) Page 19 (11)

Comment: The document's page number needs to be corrected

24.) Page 19 (11), last paragraph

The document states: “In the event an incident that poses a potential for release of hazardous substances from OU-1 occurs, a plan will be prepared after the incident response is complete to evaluate whether hazardous substances were released and if so the nature and extent of such a release. The plan will be provided to EPA for review and will be implemented upon receipt of EPA approval.

Comment: Does hazardous waste characterization require incident-specific plans or can this plan to make a plan be changed to incorporate standard characterization procedures?

25.) Page 20 (12)

Comment: The document’s page number needs to be corrected.

26.) Page 20 (12)

The fourth bullet states: “As deemed appropriate by site personnel or the emergency coordinator”

Comment: The statement suggests that unilateral changes to the IMP can be made without agreement by regulators or local authorities. This statement should be changed to include acceptance by regulators and authorities.

27.) Table 1

Comment: The emergency response procedures should include notification of potentially affected adjacent property owners, with appropriate contacts added to Table 1.

28.) Table 1

Comment: Brenda Ardrey is no longer a contact for Solid Waste Management Program—Operations. Please update to include Larry Lehman at 573-526-9941.